

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
AT MONTGOMERY**

**ANNE MARIE HUNTER,**

**Plaintiff,**

**V.**

**DURR SYSTEMS, INC.,**

**Defendant.**

**CASE NO. 2:06CV411-SRW**

**JOINT MOTION FOR LEAVE TO EXTEND DEADLINES  
AND RESPONSIBILITIES PURSUANT TO THIS COURT'S  
UNIFORM SCHEDULING ORDER (DOCUMENT 13)**

COME NOW counsel for both the Defendant and Plaintiff” and jointly move this Court for leave to extend certain deadlines and responsibilities set out in this Court’s Uniform Scheduling Order and as grounds for said motion, state the following:

1. That the Plaintiff has identified two (2) treating physicians and a psychologist in her expert disclosures that were made on November 1, 2006.
2. That counsel for Defendant is required to disclose experts by January 15, 2007.
3. That both counsel for Plaintiff and Defendant have endeavored to schedule the depositions of the two treating physicians and psychologist, all of whom are outside the state of Alabama, and have been unable to confirm dates with these three (3) professionals with Thanksgiving and Christmas and work schedules compounding counsels' efforts to get these depositions taken.
4. That both counsel for Plaintiff and Defendant desire to extend the deadline for the Defendant to disclose experts from January 15, 2007, to February 15, 2007, based upon

counsels' inability to schedule the depositions of these physicians and psychologist and due to the fact that one of these depositions may not be scheduled until early January.

5. That counsel for these parties jointly move this Court to also extend the discovery completion date from February 15, 2007 to March 15, 2007 so that Plaintiff's counsel will have an opportunity to depose Defendant's experts.

6. That all other deadlines will remain the same as set out in this Court's Uniform Scheduling Order.

s/ Thomas E. Hankins  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of November 2006, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/ James B. Carlson  
Of Counsel